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BEFORE THE ARIZONA CORPORATION COMMISSION

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TOM FORESE
BOB STUMP
ANDY TOBIN

Arizona Corporation Commission

DOCKETED

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IN THE MATTER OF THE
APPLICATION OF ARIZONA PUBLIC
SERVICE COMPANY FOR A HEARING
TO DETERMINE THE FAIR VALUE OF
THE UTILITY PROPERTY OF THE
COMPANY FOR RATEMAKING
PURPOSES, TO FIX A JUST AND
REASONABLE RATE OF RETURN
THEREON, TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP
SUCH RETURN.

DOCKET # E-01345A-16-0036

**REPLY TO ARIZONA PUBLIC
SERVICE COMPANY'S RESPONSE
TO WARREN WOODWARD'S
SECOND MOTION TO COMPEL**

IN THE MATTER OF FUEL AND
PURCHASED POWER PROCUREMENT
AUDITS FOR ARIZONA PUBLIC
SERVICE COMPANY

DOCKET # E-01345A-16-0123

Warren Woodward ("Woodward"), Intervenor in the above proceeding, hereby
replies to the Response ("Response") made by Arizona Public Service Company

("APS") to Woodward's Second Motion to Compel ("Motion") which was made in the above proceeding.

In its Response, APS pretends not know what the various costs of its "smart" grid are because, according to APS, APS does not keep track of those costs separately.

However, where APS slipped up in its alibi is in its answer to Woodward 2.19.o:

Woodward:

o. How much has been spent [on] APS's "smart" meter mesh network communication system's field equipment (such as any routers or communication towers needed) since APS began installing "smart" meters?

APS Response:

o. The total cost of the equipment and installation in the Test Year was \$1.5M.

In 2.19.o, APS clearly knows the answer, but APS chose to only answer for the Test Year, not the years about which Woodward asked. If APS knows the answer for the Test Year then it clearly knows the answer for the time period in Woodward's question.


Of course the greater and more important takeaway from APS's answer to 2.19.o is that it puts the lie to the excuse upon which APS built its entire Response, which was that APS does not keep separate track of the various costs about which Woodward inquired in his data request 2.19. APS *does* in fact keep track of costs separately; its answer to 2.19.o proves that. So APS does in fact know the answers to Woodward's data request 2.19; APS just chose not to answer.

It is long past time for APS to come clean and answer Woodward's data request

2.19 in full.

RESPECTFULLY SUBMITTED this 25th day of January, 2017.

By


Warren Woodward
200 Sierra Road
Sedona, Arizona 86336

Original and 13 copies of the foregoing hand delivered on this 25th day of January, 2017 to:

Arizona Corporation Commission
Docket Control
1200 West Washington Street
Phoenix, Arizona 85007

Copies of the foregoing mailed/e-mailed this 25th day of January, 2017 to:

Service List